Case 3::10-cv-00163-JSW Document 82 Filed 08/29/11 Page 11:06 f22 1 CAROLINE L. FOWLER, City Attorney (SBN 110313) JOHN J. FRITSCH, Assistant City Attorney (SBN 172182) 2 City of Santa Rosa 100 Santa Rosa Avenue, Room 8 3 Santa Rosa, California 95404 Telephone: (707) 543-3040 Facsimile: (707) 543-3055 4 5 Attorneys for Defendant CITY OF SANTA ROSA erroneously sued herein as SANTA ROSA POLICE **DEPARTMENT** 6 7 UNITED STATES DISTRICT COURT 8 9 NORTHERN DISTRICT OF CALIFORNIA 10 11 MARTIN GOLDSTEIN, Case No. CV 10-0163 JSW 12 Plaintiff, STIPULATION AND [PROPOSED] ORDER 13 v. CITY OF SANTA ROSA, and DOES 1-14 Trial Date: May 29, 2012 10, inclusive, 15 Defendants. 16 17 IT IS HEREBY STIPULATED AND AGREED by and between the parties through 18 their respective counsel as follows: 19 1. Pursuant to the order of this court, the discovery cut-off is September 1, 20 2011. 21 2. Plaintiff noticed the deposition of Officer Richard Boehm for August 29, 22 2011; 23 3. Monday, August 29, 2011 is Officer Boehm's day off work, and he is the 24 parent responsible for child care on that day; 25 4. Counsel and deponent mutually agree to waive the discovery cut-off for 26 the purpose of a September 7, 2011 deposition date with all other terms of 27 the Notice unchanged. 28

	Casse 3::10-cv-00163-JSW Document 82 Filed 08/29/11 Page 22cf 22	
1	So stipulated:	
2		OFFICE OF THE CITY ATTORNEY
3	Dated: August 19, 2011	/s/
4		John J. Fritsch
5		Assistant City Attorney Attorney for Defendant City of Santa Rosa
6		City of barita Rosa
7		/s/
8		Montana Podva Attorney for Plaintiff
9		Martin Goldstein
10	GOOD CAUSE APPEARING, IT IS SO ORDERED:	
11		
12	Dated: <u>August 29</u> , 2011	Hon Jeffrey S White
13		U.S District Court Judge
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
2425		
2627		
28		
20		